

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

RICKEY PHILLIPS, as Administrator of the)	
Estate of SUSAN PHILLIPS, deceased,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.
vs.)	
)	2:06-CV-84-MEF
TMA FOREST PRODUCTS GROUP, et al.,)	
)	
Defendants.)	

**CONSENT MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), Defendants Pactiv Corporation ("Pactiv") and Louisiana-Pacific Corporation ("LP") jointly move this Court for an order enlarging the time by which they may answer, plead, move, or otherwise respond to Plaintiff's Complaint through and including March 22, 2006. In support of this motion, Defendants state the following:

1. This case is one of four related lawsuits filed against Pactiv and LP in this Court. The others are styled *Edwards v. TMA Forest Products Group*, Civ. No. 2:06-CV-86-MHT; *Chambers v. TMA Forest Products Group*, Civ. No. 2:06-CV-83-WKW; and *Thompson v. TMA Forest Products Group*, Civ. No. 2:06-CV-85-WHA.

2. The earliest date that either Defendant was served with a complaint in any of the above-referenced cases was January 31, 2006. The time in which Defendants must answer, plead, move, or otherwise respond has not expired in this case (or any of the above-referenced cases).

3. Counsel for Defendants have conferred with W. Eason Mitchell, co-counsel of record for Plaintiffs in each of the above-referenced cases. Mr. Mitchell has authorized counsel for Defendants to represent to the Court that he consents and agrees that Defendants may answer, plead, move, or otherwise respond to the complaints in each of the above-referenced cases through and including March 22, 2006.

WHEREFORE, Defendants respectfully request that this Court enter the accompanying "Consent Order Enlarging Time to Respond to Complaint."

s/ H. Thomas Wells, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 21st day of February, 2006 on the following via U.S. Mail:

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s/ H. Thomas Wells, Jr.
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